

REED SMITH LLP
A limited liability partnership formed in the State of Delaware

1 Abraham J. Colman (SBN 146933)
acolman@reedsmith.com
2 Felicia Y. Yu (SBN 193316)
fyu@reedsmith.com
3 Raymond Y. Kim (SBN 251210)
rkim@reedsmith.com
4 Jack J. Gindi (SBN 293739)
Email: jgindi@reedsmith.com
5 Reed Smith LLP
355 South Grand Avenue
6 Suite 2900
Los Angeles, CA 90071-1514
7 Telephone: +1 213 457 8000
Facsimile: +1 213 457 8080
8

9 Attorneys for Defendant
Nationstar Mortgage, LLC
10

11 UNITED STATES DISTRICT COURT
12 NORTHERN DISTRICT OF CALIFORNIA
13

14 ROBERT JORDAN, SEAN HALBERT, DANA
SKELTON, and VANESSA RUGGLES
15 individually and on behalf of all others similarly
situated,

16 Plaintiffs,

17 vs.

18 NATIONSTAR MORTGAGE, LLC, a Delaware
limited liability company,

19 Defendant.
20
21
22
23
24
25
26
27
28

Case No.: 3:14-cv-00787-WHO

**DEFENDANT NATIONSTAR
MORTGAGE, LLC'S RESPONSE TO
PLAINTIFF'S MOTION TO APPOINT
INTERIM CO-LEAD CLASS COUNSEL**

Date: Wednesday, August 13, 2014

Time: 2:00 p.m.

Dept.: Courtroom 2 – 17th Floor

Complaint Filed: February 21, 2014

Consolidated Amended Complaint Filed:
June 23, 2014

On July 3, 2014, Plaintiffs Robert Jordan, Sean Halbert, Dana Skelton, and Vanessa Ruggles (“Plaintiffs”) filed a Motion to Appoint Interim Co-Lead Class Counsel under Federal Rule of Civil Procedure 23(g)(2) (the “Motion”). In the Motion, Plaintiffs request that the court appoint Jay Edelson and Steven Woodrow of Edelson PC as the interim “co-lead counsel,” and Michael Sousa, Doug Campion, and Matthew English of the Law Offices of Michael P. Sousa, Law Offices of Doug Campion, and Law Offices of Matthew G. English respectively, as the interim “official Executive Committee.” *See* Docket Item No. # 32, at 4:21-24.

Defendant Nationstar Mortgage, LLC (“Nationstar”) does not join in the Motion, and contrary to Plaintiffs’ assertion in the Motion, never agreed “not [to] oppose the proposed leadership structure.” However, although it is unclear why an appointment of interim class counsel is necessary at this juncture, Nationstar does not oppose the Motion. Nationstar reserves its right to oppose any motion for class certification brought by Plaintiffs on all grounds, including the adequacy of Plaintiffs’ counsel or the appointed interim counsel to represent the class, at the appropriate time. Nationstar also reserves its right to challenge the final appointment of class counsel in this action, and to the extent other putative class actions are filed based on the Telephone Consumer Protection Act, Nationstar reserves its right to communicate with counsel in those actions.

DATED: July 17, 2014

REED SMITH LLP

By: /s/ Raymond Y. Kim

Abraham J. Colman

Felicia Y. Yu

Raymond Y. Kim

Jack J. Gindi

Attorneys for Defendant

Nationstar Mortgage, LLC

PROOF OF SERVICE

I am a resident of the State of California, over the age of eighteen years, and not a party to the within action. I am employed in the office of a member of the bar of this court at whose direction the service was made. My business address is REED SMITH LLP, 355 S. Grand Avenue, Suite 2900, Los Angeles, CA 90017.

On July 17, 2014, I electronically filed the following document(s) with the Clerk of the Court using the CM/ECF system, which sent electronic notification of such filing to all other parties appearing on the docket sheet, as listed below.

**DEFENDANT NATIONSTAR MORTGAGE, LLC'S RESPONSE TO PLAINTIFF'S
MOTION TO APPOINT INTERIM CO-LEAD CLASS COUNSEL**

Mark Eisen
EDELSON PC
555 West Fifth Street, 31st Floor
Los Angeles, CA 90013
Telephone: (213) 533-4100
Facsimile: (213) 947-4251
E-Mail: meisen@edelson.com
**ATTORNEYS FOR PLAINTIFFS AND THE
PUNTATIVE CLASSES**

Steven L. Woodrow
Megan Lindsey
EDELSON PC
999 West 18th Street, Suite 3000
Denver, CO 80202
Telephone: (303) 357-4878
Facsimile: (303) 446.9111
E-Mail: swoodrow@edelson.com
E-Mail: mlindsey@edelson.com
**ATTORNEYS FOR PLAINTIFFS AND THE
PUNTATIVE CLASSES**

I declare under penalty of perjury under the laws of the United States that the above is true and correct. Executed on July 17, 2014, at Los Angeles, California.

/s/Patty Keen

Patty Keen